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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

ESTATE OF SAOUN POL and J.P.,
Plaintiffs,
vs.
CITY OF STOCKTON,
Defendants.

Case No.: 2:21-cv-00788-WBS-AC

**STIPULATION AND ORDER FOR
SECOND EXTENSION OF TIME TO
RESPOND TO COMPLAINT**

[Local Rule 144(a)]

[No hearing required]

1 This Stipulation is respectfully submitted by all named parties: Plaintiffs Estate of
2 Saoun Pol, by and through real party in interest J.P. (both in his representative capacity,
3 as successor in interest on behalf of the estate, and in his individual capacity, on his
4 own behalf), on the one hand; and Defendants City of Stockton (also named as
5 "Stockton Police Department") (the "City"), Chief of Police Eric Jones, Officer Jorge
6 Andrade, and Officer Bradley Miller, on the other hand, all through their undersigned
7 counsel of record.

8 RECITALS

9 A. On May 3, 2021, Plaintiffs filed this lawsuit.

10 B. On or about May 5, 2021, Plaintiffs served process on the City and
11 Officers Andrade and Miller.

12 C. On May 25, 2021, the parties filed a stipulation (i) extending the time for
13 the City and Officers Andrade and Miller to move, plead or otherwise respond to the
14 Complaint through and including June 23, 2021, and (ii) agreeing that Chief Jones is
15 deemed to have been served with process so that Plaintiffs need not serve him with
16 process. (ECF No. 6.)

17 D. Since that stipulation was filed, the parties have engaged in informal
18 discovery and settlement discussions. The discussions may result in a complete
19 resolution of the case. The parties need additional time to complete their discussions,
20 and, if the discussions do not resolve the case, for counsel for Defendants to prepare a
21 response to the Complaint.

22 E. Therefore, the parties agreed, subject to Court approval, that Defendants
23 would have an additional 21 days to move, plead, or otherwise respond to the
24 Complaint.
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STIPULATION

IT IS STIPULATED AND AGREED, by the parties, through their counsel of record, that Defendants have an extension of time, through and including July 14, 2021, to move, plead, or otherwise respond to the Complaint.

Dated: June 22, 2021

HERUM CRABTREE SUNTAG
A California Professional Corporation

By: /s/ Dana A. Suntag
DANA A. SUNTAG
Attorneys for all Defendants

Dated June 22, 2021


LAW OFFICE OF MARK E. MERIN

By: /s/ Paul H. Masuhara
MARK E. MERIN
PAUL H. MASUHARA
Attorneys for all Plaintiffs

ORDER

IT IS SO ORDERED.

Dated: June 25, 2021


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE